

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADJUSTACAM LLC
Plaintiff

v.

AMAZON.COM, INC., *et al.*
Defendants

Case No. 6:10-cv-329-LED

JURY

DEFENDANTS' JOINT INVALIDITY CONTENTIONS

Pursuant to the Court's May 26, 2011 Docket Control Order and Local Patent Rule (P.R.) 3-3 of the Rules of Practice for Patent Cases before the Eastern District of Texas, Defendants Amazon.com, Inc., Auditek Corporation, Blue Microphones, LLC, Baltic Latvian Universal Electronics, LLC D/B/A Blue Microphones, LLC D/B/A Blue Microphone, CDW Corporation F/K/A CDW Computer Centers, Inc., CDW, Inc., Compusa.com, Inc., Creative Labs, Inc., Dell, Inc., Digital Innovations, LLC, Fry's Electronics Inc., Gear Head, LLC, Hewlett-Packard Company, Lifeworks Technology Group, LLC, Macally Peripherals, Inc. D/B/A Macally U.S.A., Mace Group, Inc., Micro Electronics, Inc. DBA Micro Center, New Compusa Corporation, Newegg, Inc., Newegg.com, Inc., Office Depot, Inc., Overstock.com, Inc., Radioshack Corporation, Rosewill Inc., Sakar International, Inc., Systemax, Inc. D/B/A Compusa, Target Corp., Tigerdirect, Inc., Wal-Mart Stores, Inc., Best Buy Co. Inc., Best Buy Stores, LP, BestBuy.com, LLC, J&R Electronics Inc. D/B/A J&R, Kohls Corporation D/B/A Kohl's, and Kohl's Illinois, Inc. (collectively, "Defendants") disclose their Invalidity Contentions for U.S. Patent No. 5,855,343 ("the '343 patent") as follows:

Defendants' discovery and investigation in connection with the '343 patent are continuing, and Defendants' Invalidity Contentions are based on information obtained to date. Defendants' Invalidity Contentions are based upon, and necessarily limited by, the records and

information still in existence, presently recollected and thus far discovered in the course of preparing for trial. These Invalidity Contentions are submitted without prejudice to Defendants' right to produce and to refer to at trial, or at any other hearing, any evidence, facts, documents or information not yet discovered or not yet determined to be relevant by Defendants or their respective counsel.

In particular, Defendants' Invalidity Contentions are based in whole or in part on their present understanding of the positions of the Plaintiff AdjustaCam LLC ("AdjustaCam") concerning the scope and construction of its asserted claims, to the extent that those positions can be deduced from AdjustaCam's Infringement Contentions dated February 11, 2011 and served February 12, 2011. However, nothing herein should be construed as an admission that Defendants agree with AdjustaCam's apparent claim constructions. Defendants expressly reserve the right to propose alternative constructions to those advocated by AdjustaCam and to rebut AdjustaCam's actual claim construction positions. These Invalidity Contentions are provided only to apprise AdjustaCam of Defendants' current invalidity positions and are not intended to proffer any proposed claim constructions. Defendants reserve their rights to amend their Invalidity Contentions as may be appropriate, including upon receipt of a claim construction order from the Court.

Defendants maintain that AdjustaCam's Infringement Contentions are insufficient and are not consistent with the Patent Local Rules. For example, AdjustaCam contends that Defendants infringe "jointly" and "by inducement and contributory infringement" but provides no disclosure showing how such joint, induced, or contributory infringement relates to any accused product. AdjustaCam has provided no disclosure at all pursuant to Patent Rule 3-2(a) or (b), and has taken no steps to obtain any such documents from third parties. Furthermore, certain

Defendants have sent letters to AdjustaCam identifying particular deficiencies relating to particular charts, and have received no response from AdjustaCam or any supplemental contentions curing the errors identified in the correspondence to AdjustaCam. Accordingly, Defendants reserve their rights to modify, amend and/or supplement their Invalidity Contentions when and if AdjustaCam amends and/or clarifies its Infringement Contentions.

In its Infringement Contentions, AdjustaCam has asserted that Defendants allegedly infringe only claims 1, 7, 8, and/or 19 of the '343 Patent (with the particular combination of claims asserted varying slightly between products). Although AdjustaCam has not proffered any infringement contentions with respect to other unasserted claims of the '343 patent, Defendants reserve their rights to modify, amend and/or supplement their Invalidity Contentions if AdjustaCam asserts infringement of the presently unasserted claims of the '343 patent. At this time, Defendants are providing Invalidity Contentions for only the claims asserted by AdjustaCam, but hereby reserve their rights to seek invalidation of all claims in the '343 Patent. In addition, Defendants hereby incorporate by reference all charts and contentions relating to invalidity of the '343 Patent as set forth in Ex Parte Patent Reexamination Nos. 90/011,316 and 90/011,366 currently pending before the United States Patent and Trademark Office, as well as any other reexaminations or other action in any other administrative action, litigation, or arbitration asserting or relating to the invalidity of the '343 Patent.

I. U.S. PATENT NO. 5,855,343

Claims 1, 7, 8, and 19 of the '343 Patent are presently asserted in this lawsuit. Claims 1, 7, 8, and 19 are invalid because they fail to meet one or more of the requirements for patentability under 35 U.S.C. §§ 102, 103 and/or 112.

A. Patent Local Rules 3-3(a), (b) and (c)

The individual bases for invalidity based on prior art are provided in the following paragraphs, and the prior art references that provide these bases are listed in Appendix A. Each of these listed prior art documents, the underlying work and/or the underlying apparatus or method described in each document qualifies as prior art under one or more subsections of 35 U.S.C. § 102.

1. Prior Art: Anticipation and Obviousness

At least claims 1, 7, 8, and 19 of the '343 Patent are invalid as anticipated by the prior art patents, publications and devices listed below and described in the claim charts of Appendix A. These claim charts identify specific examples of where each limitation of claims 1, 7, 8, and 19 is found in these references.

Where Defendants cite to a particular figure in a prior art reference, the citation should be understood to encompass the caption and description of the figure and any text relating to the figure in addition to the figure itself. Conversely, where a cited portion of text refers to a figure, the citation should be understood to include the figure as well.

Although Defendants have identified in their claim charts at least one disclosure of an element for each prior art reference, each and every disclosure of the same element in the same reference is not necessarily identified. In an effort to focus the issues, Defendants have cited only representative portions of the identified references, even where a reference may contain additional support for a particular claim element. Persons of ordinary skill in the art generally read an item of prior art as a whole and in the context of other publications and literature. Thus, to understand and interpret any specific statement or disclosure within a prior art reference, such persons would rely on other information within the reference, along with other publications and

their general scientific knowledge. Defendants may rely upon uncited portions of the prior art references and on other publications and expert testimony to provide context, and as aids to understanding and interpreting the portions that are cited.

Prior Art US Patents Under 35 U.S.C. § 102(a), (b), (e), (g) and § 103

Patents
5880783
D383475
4526308
5808672
4493542

Prior Art Publications Under 35 U.S.C. § 102(a), (b) and § 103

Publications
Japanese Unexamined Utility Model Pub. No. H2-19997

Prior Art Devices Or Systems Under 35 U.S.C. §§ 102(a), (b), (g) and § 103

Systems
Bogen Photo Corp.'s Super Clamp
Bogen Photo Corp.'s Magic Arm

The claim charts for the references disclosed as anticipatory pursuant to 35 U.S.C. § 102 in the preceding section also set forth exemplary combinations of references under 35 U.S.C. § 103. Further, with respect to the listed anticipatory prior art references, Defendants also contend that such references render the asserted claims invalid as obvious in view of the references themselves.

Claims 1, 7, 8, and 19 are also invalid as obvious in view of the prior art references listed in Appendix A alone or in combination with other prior art references listed in Appendix A or in combination with what was known to one of ordinary skill in the art prior to the '343 Patent's first priority date. To the extent that AdjustaCam contends that the anticipatory prior art

references fail to disclose any limitations of the asserted claims, Defendants reserve the right to identify other prior art references and combinations that would render the claims obvious despite the allegedly missing limitations.

Under the Supreme Court's decision in *KSR Int'l, Co. v. Teleflex, Inc.*, 550 U.S. 398, 416 (2007), a "combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results." "Common sense teaches ... that familiar items may have obvious uses beyond their primary purposes, and in many cases a person of ordinary skill will be able to fit the teachings of multiple patents together like pieces of a puzzle." *Id.* at 420. "[I]f a technique has been used to improve one device, and a person of ordinary skill in the art would recognize that it would improve similar devices in the same way, using the technique is obvious unless its actual application is beyond his or her skill." *Id.* at 417. The Supreme Court reiterated that the factors set forth in *Graham v. John Deere Co.*, 383 U.S. 1 (1966), define the controlling inquiry. *KSR*, 550 U.S. at 406-07. *Graham* sets forth several factors that are applied for establishing a background for obviousness: (1) determining the scope and content of the prior art, (2) ascertaining the differences between the prior art and the claims at issue, (3) resolving the level of ordinary skill in the pertinent art, and (4) considering objective evidence present in the application indicating obviousness or nonobviousness. *Graham*, 383 U.S. at 17-18.

The suggestion or motivation to combine the cited prior art references is provided by the explicit and implicit teachings of the cited references themselves, the knowledge of one of ordinary skill in the art, and/or the nature of the problem(s) purportedly being solved. One of ordinary skill in the art would have been motivated to combine one or more of the cited prior art references because they are all directed to cameras and photography generally.

References cited in the attached Appendix A may be relied upon to show the state of the art in the relevant timeframe. The suggested obviousness combinations are in the alternative to Defendants' anticipation contentions and are not to be construed to suggest that any reference included in the combinations is not anticipatory. The obviousness combinations of references provided herein under 35 U.S.C. § 103 are merely exemplary and are not intended to be exhaustive. Additional obviousness combinations of the references identified herein are possible, and defendants reserve the right to assert any such combination(s) in this litigation.

B. Patent Local Rule 3-3(d)

Defendants list below the grounds upon which they presently contend the asserted claims of the '343 patent are invalid under 35 U.S.C. § 112. As AdjustaCam's Infringement Contentions are deficient and as discovery is only just commencing, Defendants reserve the right to amend and/or supplement these Invalidity Contentions with further invalidity allegations under Section 112 if discovery and/or claim construction leads to the conclusion that the '343 Patent is invalid on other grounds for failing to comply with the statutory requirements. For example, Defendants continue to evaluate compliance with 35 U.S.C. § 112, including the best mode requirement. Defendants anticipate taking discovery, including discovery from the alleged inventor and prior assignees of the '343 Patent to assess whether the asserted claims are invalid based on a failure to disclose the best mode of practicing the alleged invention.

1. 35 U.S.C. § 112

35 U.S.C. § 112, ¶ 1 requires that a patent specification must describe an invention sufficiently to convey to a person of skill in the art that the patentee had possession of the claimed invention at the time of the application. 35 U.S.C. § 112, ¶ 1 further requires that a patent specification describe the manner and process of making and using the invention so as to

enable a person of skill in the art to make and use the full scope of the invention without undue experimentation.

To the extent that AdjustaCam alleges that claims 1, 7, 8, and 19 of the '343 patent can be construed to cover the Accused Products, those claims are invalid under 35 U.S.C. § 112, ¶ 1 as further detailed in Appendix B. Claims 1, 7, 8, and 19 are also invalid because they fail to meet the definiteness requirements of 35 U.S.C. § 112, ¶ 2 as further detailed in Appendix B. The claims fail to point out and distinctly claim the subject matter that the patentee regards as his invention.

DATED: July 23, 2011

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served on all counsel of record by electronic mail on this day, July 23, 2011.

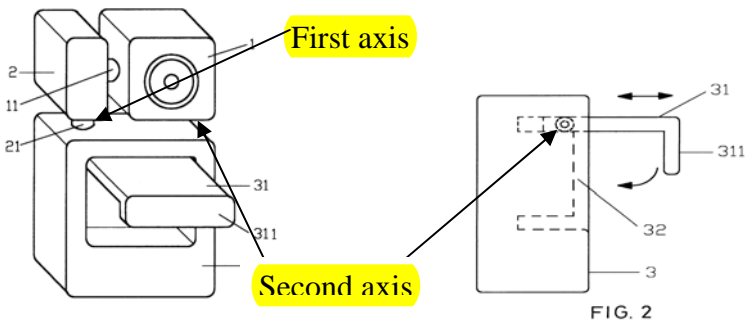
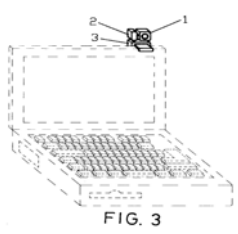
/s/ Bryan Atkinson

Appendix A

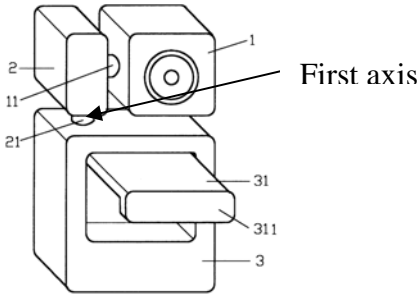
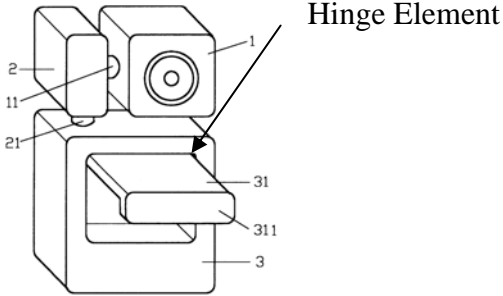
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Patent No. 5,880,783
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
1(p)	1. Apparatus for supporting a camera, having a lens, on any generally horizontal, substantially planar surface and on an object having a first surface and a second surface and an edge intersecting the first surface and the second surface, comprising:	United States Patent No. 5,880,783 ("the '783 patent") discloses an apparatus for supporting a camera having a lens. Specifically, the camera supporting apparatus can provide support on any generally horizontal, substantially planar surface and on an object (<i>i.e.</i> , display screen) having a first surface and a second surface and an edge intersecting the first surface and the second surface. Specifically, the supporting frame made up of the "circuit box 31" and "sliding hook plate 31" can be configured to provide both types of supports. With the "sliding hook plate 31" opened, the camera can be mounted on the display screen, as shown in Fig. 2. <i>See</i> '783 patent at Fig.3 and Col. 1:35-37 and 2:23-27. The "sliding hook plate 31" can also be closed to fit into the "sliding groove 32" to close the front side of the "circuit box 3," and the camera can now be supported on the planar surface. <i>See id.</i> , Fig. 2 and Col. 2:13-20.
1(a)	a. a hinge member adapted to be rotatably attached to the camera, said camera, when the hinge member is so attached, rotating, about a first axis of rotation, relative to said hinge member; and	The '783 patent discloses a hinge member adapted to be rotatably attached to the camera to allow the camera to rotate about a first axis of rotation relative to the hinge member. Specifically, the '783 patent discloses a camera in the form of a "photographic lens assembly 1" and an "adjustment block 2." A hinge member in the form of the upper part of the circuit box 3 and a "downward tubular revolving shaft 21" (<i>i.e.</i> , the "second steering element" in Claim 1 of the '783 patent) is rotatably attached to the camera. This allows the camera to rotate about a first axis of rotation relative to the hinge member. <i>See id.</i> , Col. 1:29-37.
1(b)	b. a support frame rotatably attached to said hinge member and configured to support said hinge member on the surface and the object, said hinge member rotating about a second axis of rotation relative to said support frame, said first axis of rotation being generally perpendicular to said second axis of rotation, said second axis of	The '783 patent discloses the claimed support frame, which comprises the "circuit box 3" and "sliding hook plate 31." The support frame is rotatably attached to the hinge member and provides support to the hinge member and the camera. The hinge member rotates about a second axis of rotation (see below) relative the support frame, with the second axis of rotation being generally perpendicular to the first axis of rotation (see below) and substantially parallel to the first surface.

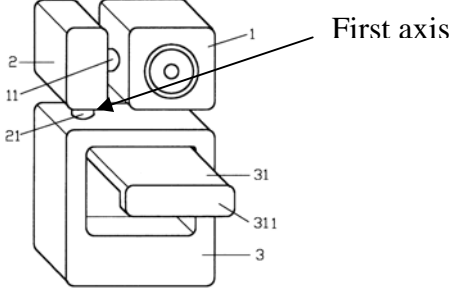
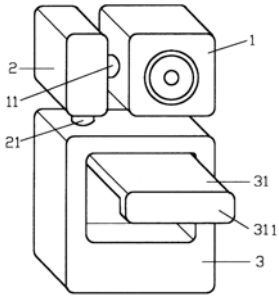
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Patent No. 5,880,783
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	rotation being substantially parallel to the first surface when said hinge member is supported on the object,	
1(c)	said support frame having a first disposition positioned on said generally horizontal, substantially planar surface, and	The "sliding hook plate 31" can be opened or closed by rotating about the hinge member, as shown in Fig. 2. When closed, the "sliding hook plate 31" is fit into the "sliding groove 32" to close the front side of the "circuit box 3," allowing the support frame to be in the first disposition positioned on the planar surface. <i>See id.</i> , Fig. 2 and Col. 2:13-20.
1(d)	said support frame having a second disposition attached to the object when said first surface and said second surface are inclined from a generally horizontal orientation, the camera being maintained adjacent said edge in said second disposition of said support frame.	When the "sliding hook plate 31" is opened, the support frame has a second disposition attached to the display screen with its two surfaces inclined from a generally horizontal orientation as shown in Fig. 3. In this position (the second disposition of the support frame), the camera can be mounted on the display screen and is maintained adjacent the edge of the display screen, as shown in Fig. 3. <i>See id.</i> , Fig. 3 and Col. 1:35-37 and 2:23-27. 
7(p)	7. Apparatus according to claim 1	The '783 patent discloses an apparatus according to claim 1. <i>See above re: claim 1.</i>
7(a)	wherein the object is a display screen for a laptop computer,	The '783 patent discloses an apparatus capable of being used with a laptop display screen. <i>See above at 1(p) and 1(d).</i>
7(b)	and the second surface is the front of the display screen	The '783 patent discloses an apparatus capable of being used with a laptop display screen in which the second surface is the front of the display screen. <i>See above at 1(p) and 1(d).</i>
7(c)	and the first surface is the back of the display screen.	The '783 patent discloses an apparatus capable of being used with a laptop display screen in which the first surface is the back of the display screen. <i>See above at 1(p) and 1(d).</i>

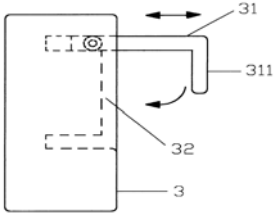
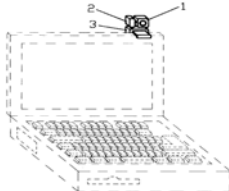
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Patent No. 5,880,783
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
8(p)	8. Apparatus according to claim 1	The '783 patent discloses an apparatus according to claim 1. See above re: claim 1.
8(a)	wherein the hinge member includes a body having a proximal and a distal end,	The '783 patent discloses a hinge member (see above re hinge member) including a body having at least two ends, one end proximal to the camera and another end distal to the camera. For example, the pivot element (see below re: pivot element) is at the proximal end and the hinge element (see below re: hinge element) is at the distal end.
8(b)	a pivot element at said proximal end of said body adapted to rotatably attach the camera to the body so that the camera rotates about the first axis relative to the body,	<p>The '783 patent discloses a pivot element at the proximal end of the body of hinge member adapted to rotatably attach the camera to said body so that the camera rotates about the first axis (see above re first axis) relative to the body.</p> 
8(c)	and a hinge element at said distal end of said body hingedly attaching said body to the support frame so that said body rotates, about the second axis, relative to the support frame.	<p>The '783 patent discloses a hinge element at the distal end of the body hingedly attaching the body to the support frame so that the body rotates, about the second axis, relative to the support frame.</p> 
19(p)	19. A camera clip for supporting a camera on a laptop computer, the laptop computer having a display screen which can be inclined from a generally horizontal	The '783 patent discloses a camera clip for supporting a camera on a laptop computer having a display screen that can be inclined from a generally horizontal position. See <i>id.</i> , Fig. 3 and Col. 2:23-26. When inclined, the uppermost portion of the display screen defines an edge. See <i>id.</i>

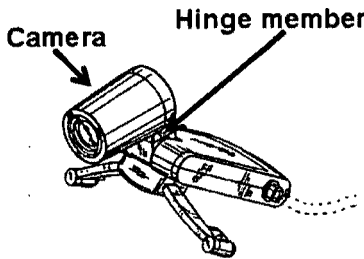
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Patent No. 5,880,783
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	position, an uppermost portion of the display screen defining an edge, comprising:	
19(a)	a. a hinge member adapted to be rotatably attached to the camera, said camera rotating about a first axis of rotation relative to said hinge member; and	<p>The '783 patent discloses a hinge member adapted to be rotatably attached to the camera to allow the camera to rotate about a first axis of rotation relative to the hinge member. Specifically, the '783 patent discloses a camera in the form of a "photographic lens assembly 1" and an "adjustment block 2." A hinge member in the form of the upper part of the circuit box 3 and a "downward tubular revolving shaft 21" (i.e., the "second steering element" in Claim 1 of the '783 patent) is rotatably attached to the camera. This allows the camera to rotate about a first axis of rotation relative to the hinge member. <i>See id.</i>, Col. 1:29-37.</p> 
19(b)	b. a support frame hingedly attached to said hinge member to engagingly support said hinge member on the display screen,	<p>The '783 patent discloses the claimed support frame, which comprises the "circuit box 3" and "sliding hook plate 31." The support frame is hingedly attached to the hinge member and provides support to the hinge member and the camera on the display screen.</p> 
19(c)	said hinge member rotating over a second axis of rotation relative to said support frame,	<p>The hinge member rotates about a second axis of rotation (shown below) relative the support frame.</p>

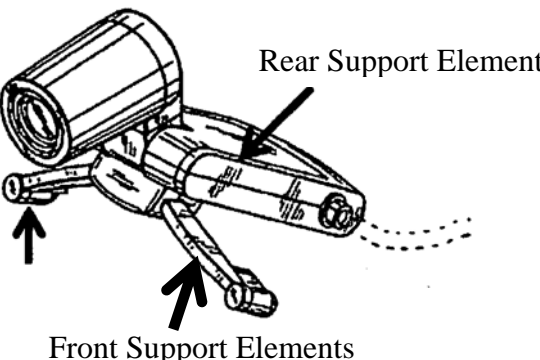
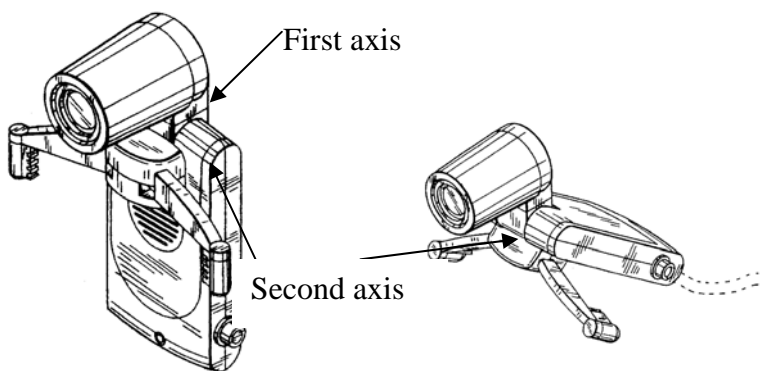
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Patent No. 5,880,783
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	the camera being maintained adjacent the edge,	 <p style="text-align: center;">FIG. 2</p>
19(d)	rotation of said support frame being prevented along an axis substantially parallel to said second axis where said second axis is substantially parallel to said edge.	<p>When the "sliding hook plate 31" is in the position shown in Figs. 1 and 3, the support frame is mounted to the display screen with the camera being maintained adjacent the edge of the display screen. <i>See id.</i>, Fig. 3 and Col. 2:2-27. In this position, the rotation of the support frame is prevented along an axis substantially parallel to the second axis where said second axis is substantially parallel to the edge. <i>See id.</i>, Figs. 1 and 3, and Col. 1:35-37 and 2:23-27.</p>  <p style="text-align: center;">FIG. 3</p>

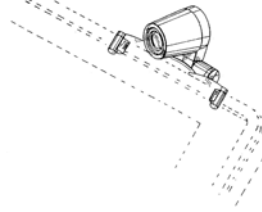
**Invalidity of Asserted Claims of the ‘343 Patent In View Of:
U.S. Design Patent No. D383,475
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
1(p)	1. Apparatus for supporting a camera, having a lens, on any generally horizontal, substantially planar surface and on an object having a first surface and a second surface and an edge intersecting the first surface and the second surface, comprising:	United States Design Patent No. D383,475 (“the ‘475 patent”) discloses an apparatus for supporting a camera having a lens. Specifically, the camera supporting apparatus can provide support on any generally horizontal, substantially planar surface and on an object (<i>i.e.</i> , display screen) having a first surface and a second surface and an edge intersecting the first surface and the second surface. Specifically, the supporting frame made up of a rear support element and two front support elements can be configured to provide support in two positions, one for the planar surface and the other for the edge of the display screen. <i>See</i> ‘475 patent, Figs. 2 and 16, and p. 1 (description of the figures).
1(a)	a. a hinge member adapted to be rotatably attached to the camera, said camera, when the hinge member is so attached, rotating, about a first axis of rotation, relative to said hinge member; and	<p>The ‘475 patent discloses a camera and hinge member.</p>  <p>Furthermore, it would have been obvious for one of ordinary skill in the art to adapt the hinge member to have it rotatably attached to the camera, so that the camera can be rotated in circular fashion in relation to the hinge through an axis of rotation. This would create another degree of freedom or additional adjustment for the camera supporting structure, and one of ordinary skill in the art would be motivated to make such modification.</p> <p><i>See</i> U.S. Patent No. 5,808,672 (disclosing a camera supporting structure with the camera head being “supported rotatably in the vertical direction or the horizontal direction relative to the holder”). <i>See id.</i> at Figs. 3-4, Abstract, Col. 2:36-38 and 3:39-42. One of ordinary skill in the art would have been motivated to make such modification to include the teaching of the this reference with the ‘783 patent regarding the "first axis of rotation" because, for example, the modification would create another degree of freedom or additional adjustment for the camera supporting structure.</p> <p><i>See</i> U.S. Patent No. 4,493,542 (disclosing a camera with a camera body and a handle grip, where the body can be rotated</p>

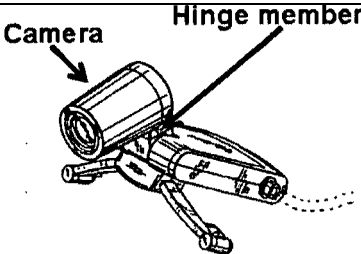
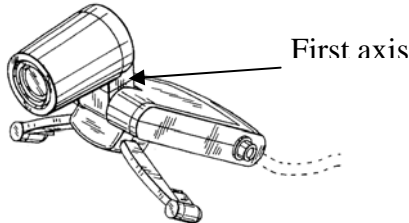
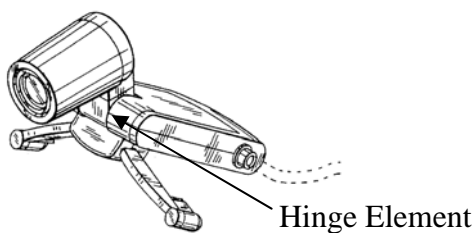
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Design Patent No. D383,475
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		relative to the handle grip through an angle of about 90°). <i>See id.</i> at Figs. 2-3 and 7-8, Abstract. One of ordinary skill in the art would have been motivated to make such modification to the '783 patent to include the teaching of the '542 patent regarding the "first axis of rotation" because, for example, the modification would create another degree of freedom or additional adjustment for the camera supporting structure.
1(b)	b. a support frame rotatably attached to said hinge member and configured to support said hinge member on the surface and the object, said hinge member rotating about a second axis of rotation relative to said support frame, said first axis of rotation being generally perpendicular to said second axis of rotation, said second axis of rotation being substantially parallel to the first surface when said hinge member is supported on the object,	<p>The '475 patent discloses the claimed support frame, which comprises a rear support element and two front support elements.</p>  <p>The support frame can be configured to provide support in two positions, one for the planar surface and the other for the edge of the display screen. <i>See</i> '783 patent, Figs. 2 and 16, and p. 1 (description of the figures). The support frame is rotatably attached to the hinge member and provides support to the hinge member and the camera. <i>Id.</i> The hinge member rotates about a second axis of rotation (shown below) relative to the support frame, with the second axis of rotation being generally perpendicular to the first axis of rotation (shown below) and substantially parallel to the first surface:</p> 

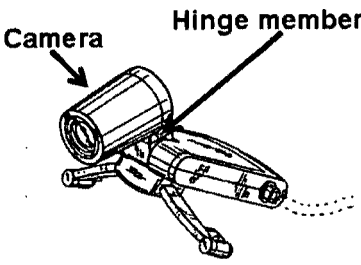
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Design Patent No. D383,475
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
1(c)	said support frame having a first disposition positioned on said generally horizontal, substantially planar surface, and	The support frame can be in various positions, including the two positions shown in Figs. 1 and 2 above. When in the position shown in Fig. 2, the support frame is in the first disposition positioned on the planar surface.
1(d)	said support frame having a second disposition attached to the object when said first surface and said second surface are inclined from a generally horizontal orientation, the camera being maintained adjacent said edge in said second disposition of said support frame.	When in the position shown in Figs. 1 and 16, the support frame has a second disposition attached to the display screen with its two surfaces inclined from a generally horizontal orientation as shown in Fig. 16. In this position (the second disposition of the support frame), the camera can be mounted on the display screen and is maintained adjacent the edge of the display screen, as shown in Fig. 16. <i>See id.</i> , Fig. 16 and p. 1 (describing Fig. 16 as "a fragmentary perspective view of the video camera placed on a fragmentary portion of a monitor shown in broken lines"). 
7(p)	7. Apparatus according to claim 1	The '475 patent discloses an apparatus according to claim 1. See above re: claim 1.
7(a)	wherein the object is a display screen for a laptop computer,	The '475 patent discloses an apparatus capable of being used with a laptop display screen. See above at 1(p) and 1(d).
7(b)	and the second surface is the front of the display screen	The '475 patent discloses an apparatus capable of being used with a laptop display screen in which the second surface is the front of the display screen. See above at 1(p) and 1(d).
7(c)	and the first surface is the back of the display screen.	The '475 patent discloses an apparatus capable of being used with a laptop display screen in which the first surface is the back of the display screen. See above at 1(p) and 1(d).
8(p)	8. Apparatus according to claim 1	The '475 patent discloses an apparatus according to claim 1. See above re: claim 1.
8(a)	wherein the hinge member includes a body having a proximal and a distal end,	The '475 patent discloses a hinge member (see above re hinge member) including a body having at least two ends, one end proximal to the camera and another end distal to the camera. For example, the pivot element (see below re: pivot element) is at the proximal end and the hinge element (see below re: hinge element) is at the distal end.

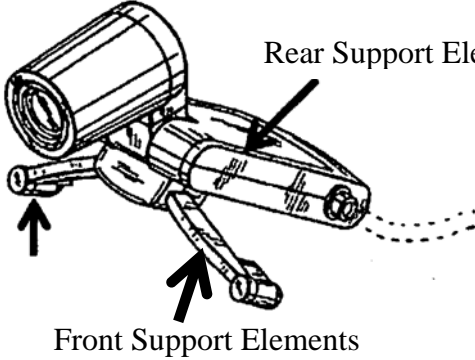
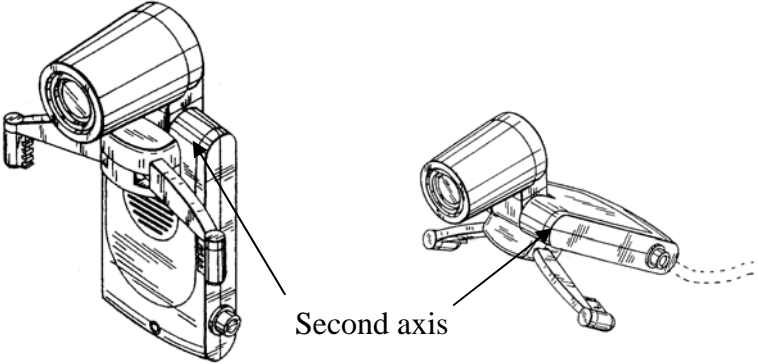
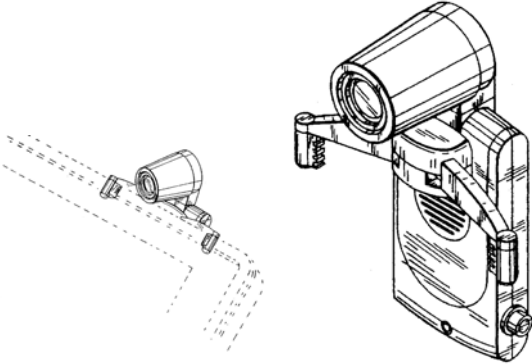
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Design Patent No. D383,475
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		
8(b)	a pivot element at said proximal end of said body adapted to rotatably attach the camera to the body so that the camera rotates about the first axis relative to the body,	<p>The '475 patent discloses a pivot element at the proximal end of the body of hinge member adapted to rotatably attach the camera to said body so that the camera rotates about the first axis (see above re first axis) relative to the body.</p> 
8(c)	and a hinge element at said distal end of said body hingedly attaching said body to the support frame so that said body rotates, about the second axis, relative to the support frame.	<p>The '475 patent discloses a hinge element at the distal end of the body hingedly attaching the body to the support frame so that the body rotates, about the second axis, relative to the support frame.</p> 
19(p)	19. A camera clip for supporting a camera on a laptop computer, the laptop computer having a display screen which can be inclined from a generally horizontal position, an uppermost portion of the display screen defining an edge, comprising:	<p>The '475 patent discloses a camera clip for supporting a camera on a laptop computer having a display screen that can be inclined from a generally horizontal position. <i>See</i> discussion re: claim 1; <i>see also</i> Figs. 2 and 16. When inclined, the uppermost portion of the display screen defines an edge. <i>See id.</i></p>
19(a)	a. a hinge member adapted to be rotatably attached to the camera,	<p>The '475 patent discloses a hinge member adapted to be rotatably attached to the camera to allow the camera to rotate about a first axis of rotation relative to the hinge member.</p>

**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Design Patent No. D383,475
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	said camera rotating about a first axis of rotation relative to said hinge member; and	 <p>Furthermore, it would have been obvious for one of ordinary skill in the art to adapt the hinge member to have it rotatably attached to the camera, so that the camera can be rotated in circular fashion in relation to the hinge through an axis of rotation. This would create another degree of freedom or additional adjustment for the camera supporting structure, and one of ordinary skill in the art would be motivated to make such modification.</p> <p><i>See</i> U.S. Patent No. 5,808,672 (disclosing a camera supporting structure with the camera head being "supported rotatably in the vertical direction or the horizontal direction relative to the holder"). <i>See id.</i> at Figs. 3-4, Abstract, Col. 2:36-38 and 3:39-42. One of ordinary skill in the art would have been motivated to make such modification to include the teaching of the this reference with the '783 patent regarding the "first axis of rotation" because, for example, the modification would create another degree of freedom or additional adjustment for the camera supporting structure.</p> <p><i>See</i> U.S. Patent No. 4,493,542 (disclosing a camera with a camera body and a handle grip, where the body can be rotated relative to the handle grip through an angle of about 90°). <i>See id.</i> at Figs. 2-3 and 7-8, Abstract. One of ordinary skill in the art would have been motivated to make such modification to the '783 patent to include the teaching of the '542 patent regarding the "first axis of rotation" because, for example, the modification would create another degree of freedom or additional adjustment for the camera supporting structure.</p>
19(b)	b. a support frame hingedly attached to said hinge member to engagingly support said	The '475 patent discloses the claimed support frame, which comprises a rear support element and two front support elements.

**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Design Patent No. D383,475
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	hinge member on the display screen,	 <p style="text-align: center;">Rear Support Element</p> <p style="text-align: center;">Front Support Elements</p>
19(c)	said hinge member rotating over a second axis of rotation relative to said support frame, the camera being maintained adjacent the edge,	<p>The hinge member rotates about a second axis of rotation (shown below) relative the support frame.</p>  <p style="text-align: center;">Second axis</p>
19(d)	rotation of said support frame being prevented along an axis substantially parallel to said second axis where said second axis is substantially parallel to said edge.	<p>When the support frame is in the position shown in Figs. 1 and 16, the support frame is mounted to the display screen with the camera being maintained adjacent the edge of the display screen. <i>See id.</i>, Fig. 16 and Col. 2:2-27. In this position, the rotation of the support frame is prevented along an axis substantially parallel to the second axis where said second axis is substantially parallel to the edge. <i>See id.</i>, Fig. 16, Fig. 1.</p> 

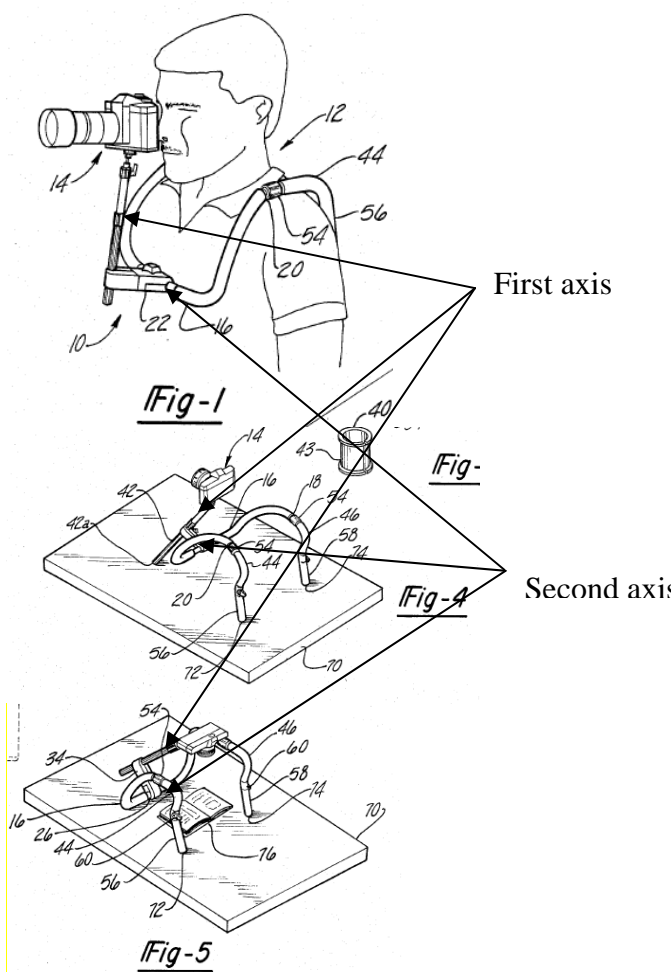
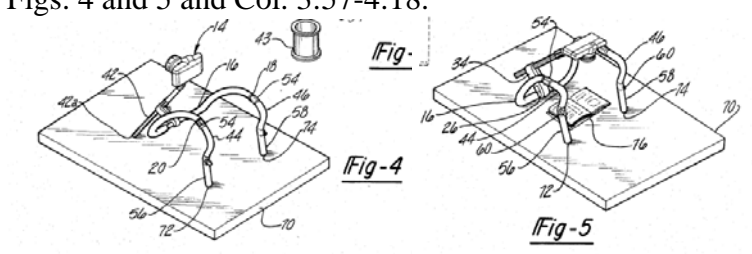
Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
1(p)	1. Apparatus for supporting a camera, having a lens, on any generally horizontal, substantially planar surface and on an object having a first surface and a second surface and an edge intersecting the first surface and the second surface, comprising:	United States Patent No. 4,526,308 ("the '308 patent") discloses an apparatus for supporting a camera having a lens. Specifically, the camera supporting apparatus (i.e., "camera support 10") can provide support on any generally horizontal, substantially planar surface and on an object having a first surface and a second surface and an edge intersecting the first surface and the second surface. In the '308 patent, the object is a person's body and the edge is the shoulder. <i>See</i> '308 patent, Fig. 1 and col. 2:7-11. Specifically, the supporting frame made up of a U-shaped tube 16, upper shoulder tubes 44, 46, and lower shoulder tubes 56, 58 and can be configured to provide both types of supports, as shown in Fig. 1 (on the shoulder) and Fig. 5 (on planar surface). <i>See id.</i> , Figs. 1 and 5, col. 1:34-46.
1(a)	a. a hinge member adapted to be rotatably attached to the camera, said camera, when the hinge member is so attached, rotating, about a first axis of rotation, relative to said hinge member; and	The '308 patent discloses a hinge member adapted to be rotatably attached to the camera 14 to allow the camera to rotate about a first axis of rotation relative to the hinge member. Specifically, mounting tube 42 and/or the mounting means 22 is rotatably attached to the camera. This allows the camera to rotate about a first axis of rotation relative to the hinge member. In Fig. 2, arrow 80 shows this rotation, which is available through the use of a cam lock. <i>See id.</i> , col. 4:28-31. The rotation of the camera along the claimed "first axis of rotation" is shown clearly when comparing Fig. 4 and Fig. 5 of the '308 patent, when the camera is rotated 180°. <i>See id.</i> , Figs. 1-2 and 4-5. Furthermore, the mounting means 22 further provides 360° rotation about each of the three perpendicular axes," which would also include the claimed "first axis of rotation." <i>See id.</i> at Col. 2:23-25.
1(b)	b. a support frame rotatably attached to said hinge member and configured to support said hinge member on the surface and the object, said hinge member rotating about a second axis of rotation relative to said support frame, said first axis of rotation being generally perpendicular to said second axis of rotation,	The '308 patent discloses the claimed support frame comprising a U-shape tube 16, upper shoulder tubes 44, 46, and lower shoulder tubes 56, 58. The support frame can be configured to provide both types of supports, as shown in Fig. 1 (on the shoulder) and Fig. 5 (on planar surface). <i>See id.</i> , Figs. 1 and 5, Col. 1:34-46. The support frame is rotatably attached to the hinge member and provides support to the hinge member and the camera. The hinge member rotates about a second axis of rotation (see below) relative the support frame, with the second axis of rotation being generally perpendicular to the first axis of rotation (see below) and substantially parallel to the first surface. In particular, the mounting means 22 is capable of providing 360° rotation about "each of the three perpendicular axes," which would include the claimed "second axis of rotation."

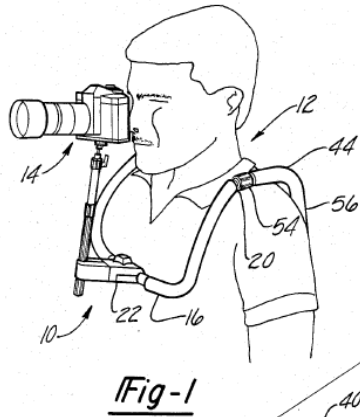
Invalidity of Asserted Claims of the '343 Patent In View Of:

U.S. Patent No. 4,526,308

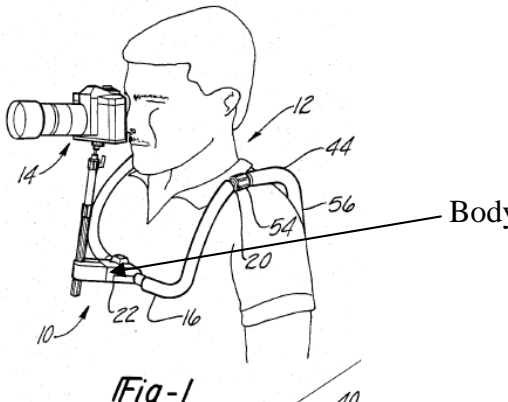
Under 35 U.S.C. 102 and/or 103

	Claim Language	Disclosure in Prior Art
	said second axis of rotation being substantially parallel to the first surface when said hinge member is supported on the object,	<p><i>See id.</i> at Col. 2:23-25.</p> 
1(c)	said support frame having a first disposition positioned on said generally horizontal, substantially planar surface, and	<p>In the position shown in Figs. 4 and 5, the support frame is in the first disposition positioned on the planar surface. <i>See id.</i>, Figs. 4 and 5 and Col. 3:57-4:18.</p> 
1(d)	said support frame having a second disposition attached to the object when said first	<p>In the position shown in Fig. 1, the support frame has a second disposition attached to the object, or the human body, with the front body surface and back body surface inclined from a generally horizontal orientation as shown in Fig. 1. In</p>

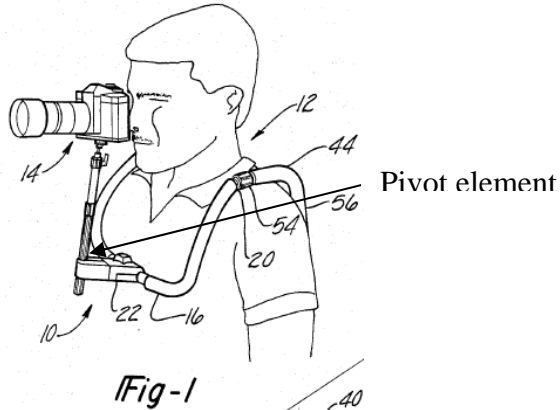
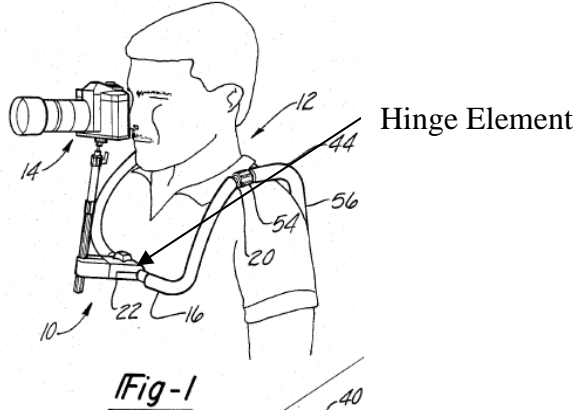
Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	surface and said second surface are inclined from a generally horizontal orientation, the camera being maintained adjacent said edge in said second disposition of said support frame.	<p>this position (the second disposition of the support frame), the camera can be mounted on the shoulder and is maintained adjacent the edge of body, as shown in Fig. 1. <i>See id.</i>, Fig. 1, Abstract, and Col. 2:7-11.</p>  <p><i>Fig-1</i></p>
7(p)	7. Apparatus according to claim 1	The '308 patent discloses an apparatus according to claim 1. See above re: claim 1.
7(a)	wherein the object is a display screen for a laptop computer,	<p>The '308 patent discloses an apparatus capable of being used with an object (the human body). See above at 1(p) and 1(d). It would have been obvious for one of ordinary skill in the art to reduce the proportional size of the structure disclosed in the '308 patent such that it would be usable on laptop display screen in the same way that the '308 patent discloses for on humans.</p> <p><i>See U.S. Patent No. 5,880,783</i> <i>See U.S. Design Patent No. D383,475</i> <i>See U.S. Patent No. 5,808,672</i></p>
7(b)	and the second surface is the front of the display screen	<p>The '308 patent discloses an apparatus capable of being used with a second surface (the front of the human body). See above at 1(p) and 1(d). It would have been obvious for one of ordinary skill in the art to reduce the proportional size of the structure disclosed in the '308 patent such that it would be usable on laptop computers with a second surface being the front of a display screen in the same way that the '308 patent discloses for the front of humans.</p> <p><i>See U.S. Patent No. 5,880,783</i> <i>See U.S. Design Patent No. D383,475</i> <i>See U.S. Patent No. 5,808,672</i></p>
7(c)	and the first surface is the back of the display screen.	The '308 patent discloses an apparatus capable of being used with a first surface (the back of the human body). See above at 1(p) and 1(d). It would have been obvious for one of ordinary skill in the art to reduce the proportional size of the

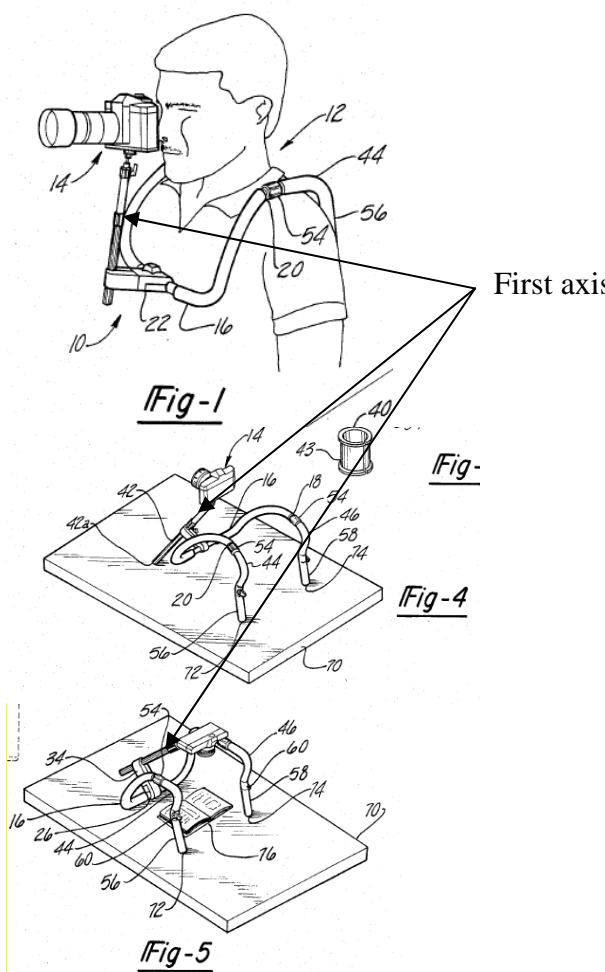
Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		structure disclosed in the '308 patent such that it would be usable on laptop computers with a first surface being the back of a display screen in the same way that the '308 patent discloses for the back of humans. <i>See</i> U.S. Patent No. 5,880,783 <i>See</i> U.S. Design Patent No. D383,475 <i>See</i> U.S. Patent No. 5,808,672
8(p)	8. Apparatus according to claim 1	The '308 patent discloses an apparatus according to claim 1. <i>See</i> above re: claim 1.
8(a)	wherein the hinge member includes a body having a proximal and a distal end,	The '308 patent discloses a hinge member (see above re hinge member) including a body having at least two ends, one end proximal to the camera and another end distal to the camera. For example, the camera 14 is attached to a bayonet mount at the proximal end of mounting tube 42, which is attached to a U-shape tube 16 at the distal end by mounting means 22. <i>See id.</i> at Fig. 1 and Fig. 5. 
8(b)	a pivot element at said proximal end of said body adapted to rotatably attach the camera to the body so that the camera rotates about the first axis relative to the body,	The '308 patent discloses a pivot element at the proximal end of the body of hinge member adapted to rotatably attach the camera to said body so that the camera rotates about the first axis (see above re first axis) relative to the body. For example, the camera 14 is attached to a bayonet mount at the proximal end of mounting tube 42, and rotates around a first axis relative to the body. <i>See id.</i> at Fig. 1; col. 2:65-67.

Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		 <p><i>Fig-1</i></p>
8(c)	and a hinge element at said distal end of said body hingedly attaching said body to the support frame so that said body rotates, about the second axis, relative to the support frame.	<p>The '308 patent discloses a hinge element at the distal end of the body hingedly attaching the body to the support frame so that the body rotates, about the second axis, relative to the support frame. <i>See id.</i> at Fig. 1; Fig. 5; col. 2:27-38.</p>  <p><i>Fig-1</i></p>
19(p)	19. A camera clip for supporting a camera on a laptop computer, the laptop computer having a display screen which can be inclined from a generally horizontal position, an uppermost portion of the display screen defining an edge, comprising:	<p>The '308 patent discloses a camera clip for supporting a camera on a human body. <i>See above at 1(p).</i> It would have been obvious for one of ordinary skill in the art to reduce the proportional size of the structure disclosed in the '308 patent such that it would be usable on laptop computers having a display screen, which can be inclined from a generally horizontal position and with an uppermost portion of the display screen defining an edge, in the same way that the '308 patent discloses for on humans. <i>See U.S. Patent No. 5,880,783</i> <i>See U.S. Design Patent No. D383,475</i> <i>See U.S. Patent No. 5,808,672</i></p>
19(a)	a. a hinge member adapted to be rotatably	<p>The '308 patent discloses a hinge member adapted to be rotatably attached to the camera to allow the camera to rotate</p>

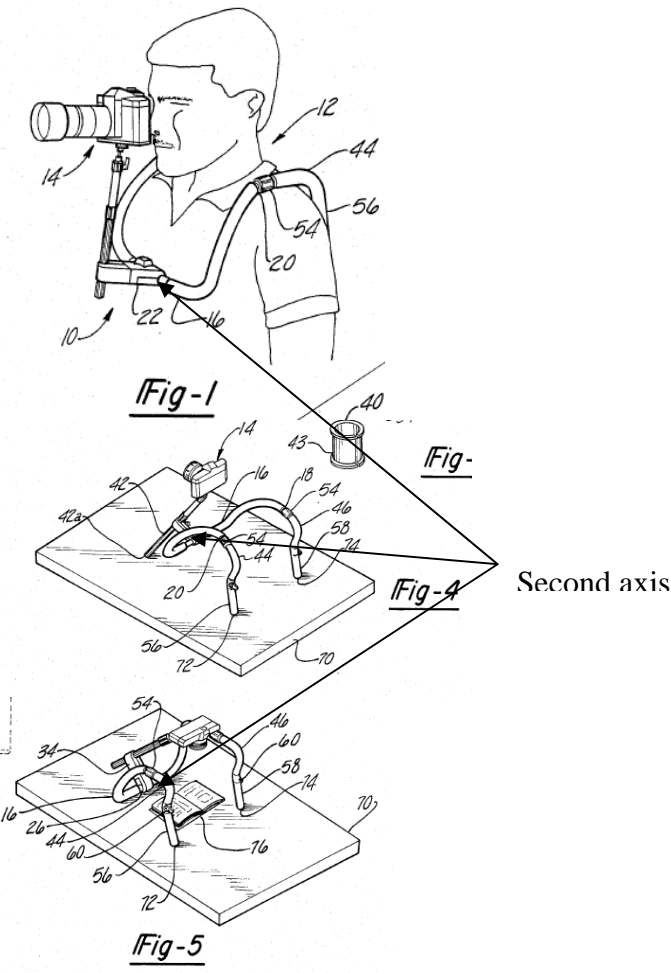
Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	attached to the camera, said camera rotating about a first axis of rotation relative to said hinge member; and	<p>about a first axis of rotation relative to the hinge member. Specifically, mounting tube 42 and/or the mounting means 22 is rotatably attached to the camera. This allows the camera to rotate about a first axis of rotation relative to the hinge member. In Fig. 2, arrow 80 shows this rotation, which is available through the use of a cam lock. <i>See id.</i>, col. 4:28-31. The rotation of the camera along the claimed "first axis of rotation" is shown clearly when comparing Fig. 4 and Fig. 5 of the '308 patent, when the camera is rotated 180°. <i>See id.</i>, Figs. 1-2 and 4-5. Furthermore, the mounting means 22 further provides 360° rotation about each of the three perpendicular axes," which would also include the claimed "first axis of rotation." <i>See id.</i> at col. 2:23-25.</p>  <p>Fig-1</p> <p>Fig-4</p> <p>Fig-5</p>
19(b)	b. a support frame	The '308 patent discloses the claimed support frame, which

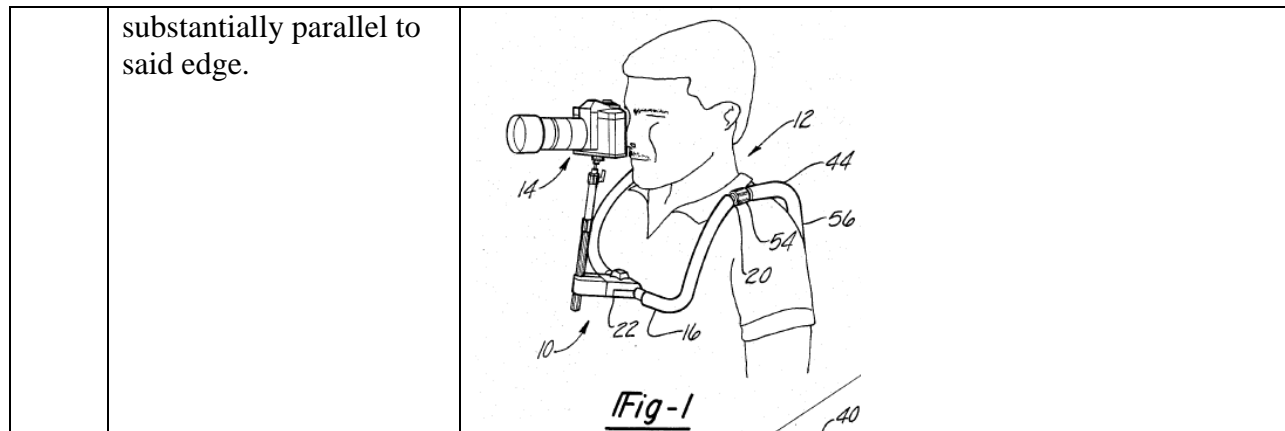
Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	hingedly attached to said hinge member to engagingly support said hinge member on the display screen,	<p>comprises a U-shape tube 16, upper shoulder tubes 44, 46, and lower shoulder tubes 56, 58. The support frame can be configured to provide both types of supports, as shown in Fig. 1 (on the shoulder) and Fig. 5 (on planar surface). <i>See /d.</i>, Figs. 1 and 5, Col. 1:34-46. The support frame is rotatably attached to the hinge member and provides support to the hinge member and the camera.</p> <p>It would have been obvious for one of ordinary skill in the art to reduce the proportional size of the structure disclosed in the '308 patent such that it would be usable on laptop display screen in the same way that the '308 patent discloses for on humans.</p> <p><i>See</i> U.S. Patent No. 5,880,783 <i>See</i> U.S. Design Patent No. D383,475 <i>See</i> U.S. Patent No. 5,808,672</p>

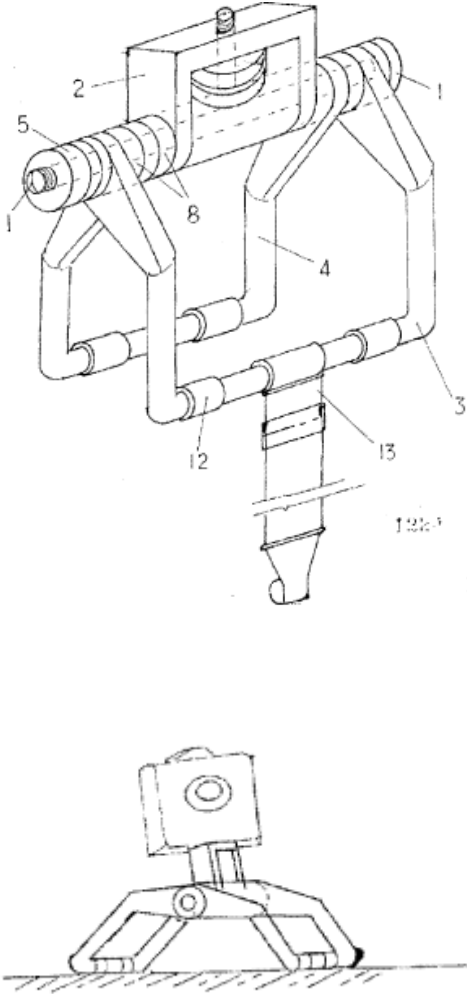
Invalidity of Asserted Claims of the '343 Patent In View Of:**U.S. Patent No. 4,526,308****Under 35 U.S.C. 102 and/or 103**

19(c)	said hinge member rotating over a second axis of rotation relative to said support frame, the camera being maintained adjacent the edge,	<p>The hinge member rotates about a second axis of rotation (see below) relative the support frame, with the second axis of rotation being generally perpendicular to the first axis of rotation (see below) and substantially parallel to the first surface. In particular, the mounting means 22 is capable of providing 360° rotation about "each of the three perpendicular axes," which would include the claimed "second axis of rotation." <i>See id.</i> at Col. 2:23-25.</p> 
19(d)	rotation of said support frame being prevented along an axis substantially parallel to said second axis where said second axis is	<p>The rotation of the support frame is prevented along an axis substantially parallel to the second axis where said second axis is substantially parallel to the edge, as shown in Figure 1. <i>See id.</i>, Fig. 1.</p>

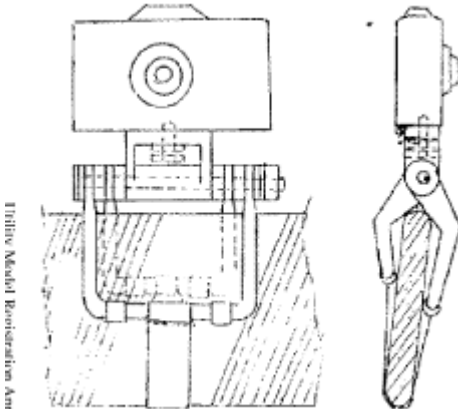
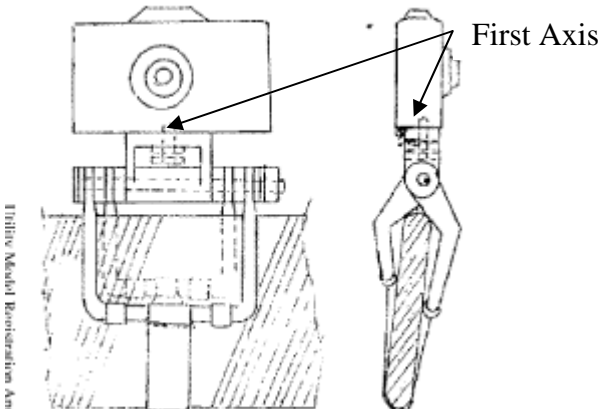
**Invalidity of Asserted Claims of the '343 Patent In View Of:
U.S. Patent No. 4,526,308
Under 35 U.S.C. 102 and/or 103**



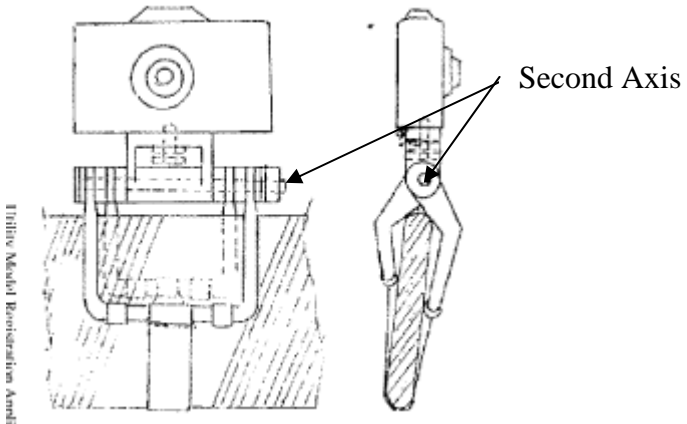
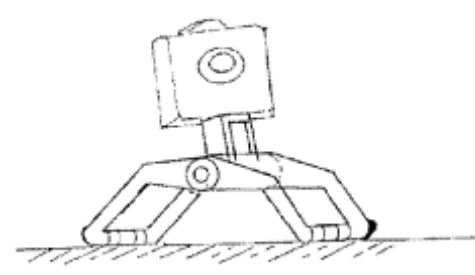
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
1(p)	1. Apparatus for supporting a camera, having a lens, on any generally horizontal, substantially planar surface and on an object having a first surface and a second surface and an edge intersecting the first surface and the second surface, comprising:	<p>Japanese Unexamined Utility Model Publication H2-19997 ("Irifune") discloses an apparatus for supporting a camera having a lens on a generally horizontal, substantially planar surface.</p>  <p>Irifune discloses an apparatus for supporting a camera having a lens on an object having a first surface and a second surface and an edge intersecting the first surface and the second surface</p>

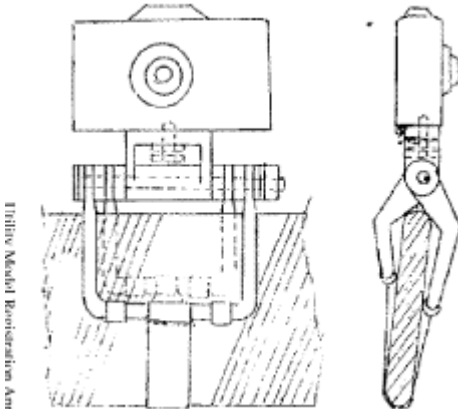
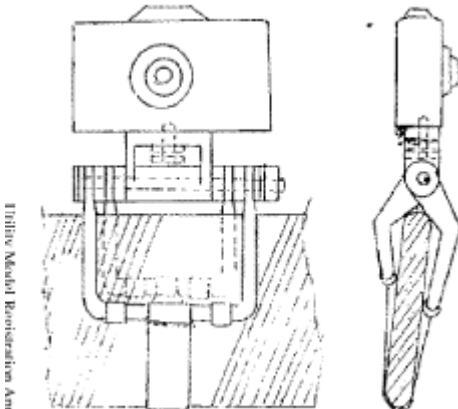
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		
1(a)	a. a hinge member adapted to be rotatably attached to the camera, said camera, when the hinge member is so attached, rotating, about a first axis of rotation, relative to said hinge member; and	<p>Irifune discloses a hinge member adapted to be rotatably attached to a camera, the camera, when the hinge member is so attached, rotating, about a first axis of rotation, relative to the hinge member.</p> 
1(b)	b. a support frame rotatably attached to said hinge member and configured to support said hinge member on the surface and the object, said hinge member rotating about a second axis of rotation relative to said support frame, said first axis of rotation being generally perpendicular to said second axis of rotation, said second axis of rotation being substantially parallel to the first surface when said hinge member is supported on the object.	<p>Irifune discloses a support frame rotatably attached to the hinge member and configured to support the hinge member on the surface and the object, the hinge member rotating about a second axis of rotation relative to said support frame, the first axis of rotation being generally perpendicular to said second axis of rotation, said second axis of rotation being substantially parallel to the first surface when said hinge member is supported on the object.</p>

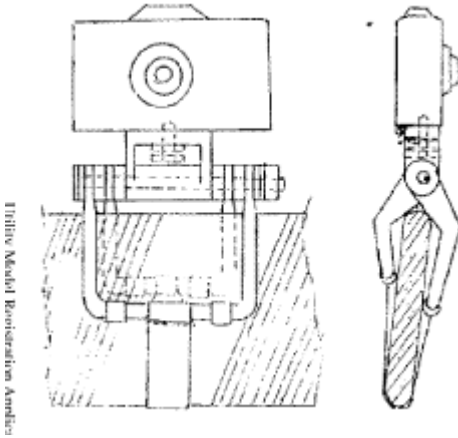
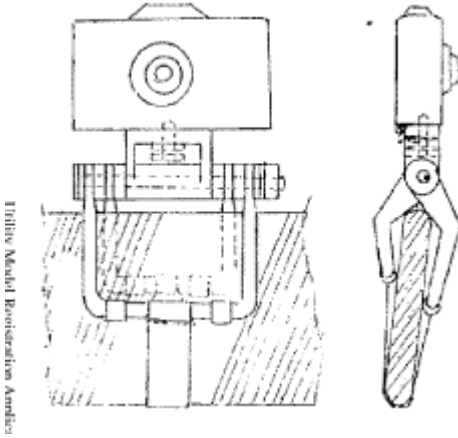
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	perpendicular to said second axis of rotation, said second axis of rotation being substantially parallel to the first surface when said hinge member is supported on the object,	 <p style="text-align: right;">Second Axis</p>
1(c)	said support frame having a first disposition positioned on said generally horizontal, substantially planar surface, and	<p>Irifune discloses a first disposition positioned on the generally horizontal, substantially planar surface.</p> 
1(d)	said support frame having a second disposition attached to the object when said first surface and said second surface are inclined from a generally horizontal orientation, the camera being maintained adjacent said edge in said second disposition of said support arm.	<p>Irifune discloses a second disposition attached to the object when the first surface and the second surface are included from a generally horizontal orientation, the camera being maintained adjacent said edge in said second disposition of said support arm.</p>

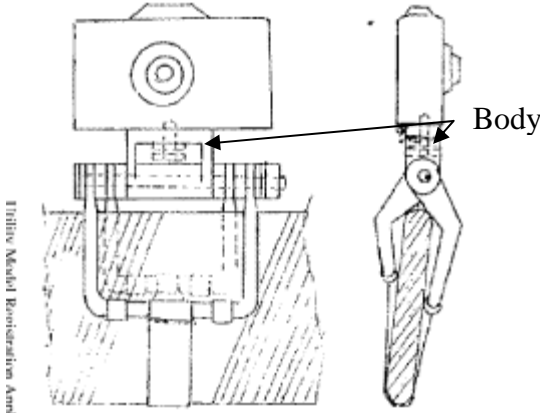
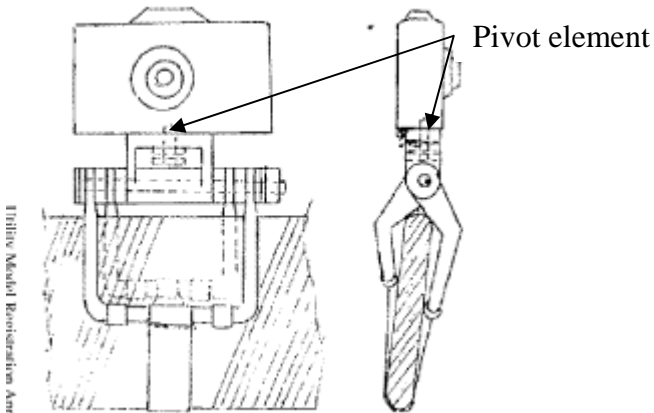
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		
7(p)	7. Apparatus according to claim 1	Irifune discloses an apparatus according to claim 1. See above re: claim 1.
7(a)	wherein the object is a display screen for a laptop computer,	<p>Irifune discloses an apparatus capable of being used with a laptop display screen. See above at 1(p) and 1(d).</p>  <p>It would have been obvious for one of ordinary skill in the art to combine Irifune with a laptop display screen in the same way as for other planar vertical surfaces as disclosed in Irifune. See U.S. Patent No. 5,880,783 See U.S. Design Patent No. D383,475 See U.S. Patent No. 5,808,672</p>
7(b)	and the second surface is the front of the display screen	Irifune discloses an apparatus capable of being used with a laptop display screen in which the second surface is the front of the display screen. See above at 1(p) and 1(d).

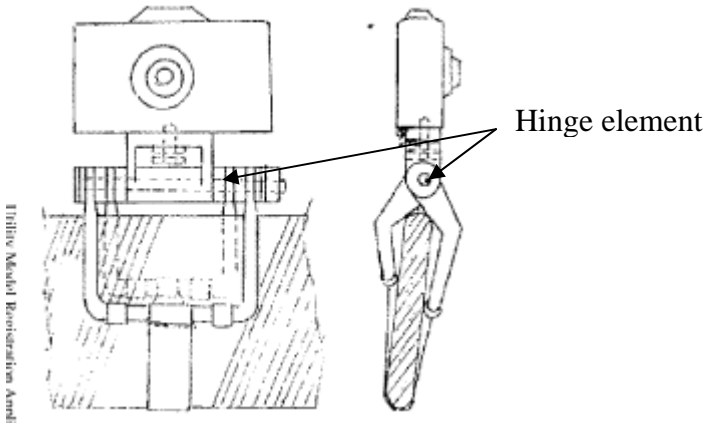
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		 <p>It would have been obvious for one of ordinary skill in the art to combine Irifune with a laptop display screen in the same way as for other planar vertical surfaces as disclosed in Irifune. See U.S. Patent No. 5,880,783 See U.S. Design Patent No. D383,475 See U.S. Patent No. 5,808,672</p>
7(c)	and the first surface is the back of the display screen.	 <p>Irifune discloses an apparatus capable of being used with a laptop display screen in which the first surface is the back of the display screen. See above at 1(p) and 1(d).</p> <p>It would have been obvious for one of ordinary skill in the art to combine Irifune with a laptop display screen in the same way as for other planar vertical surfaces as disclosed in Irifune. See U.S. Patent No. 5,880,783</p>

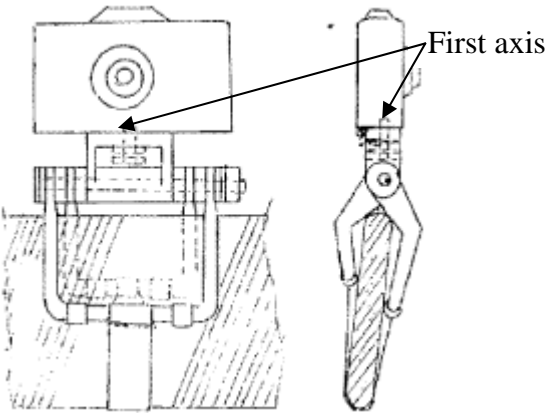
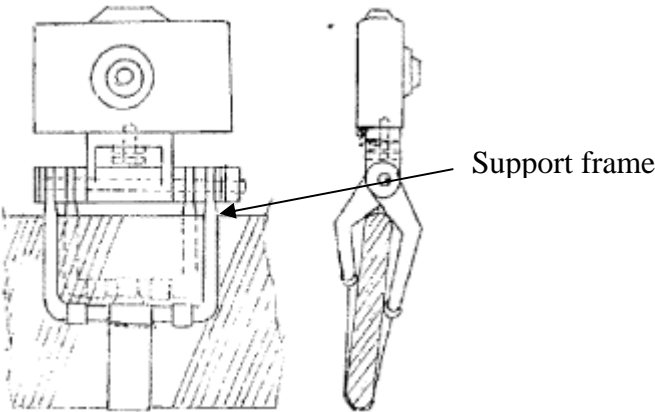
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Trifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		See U.S. Design Patent No. D383,475 See U.S. Patent No. 5,808,672
8(p)	8. Apparatus according to claim 1	Irifune discloses an apparatus according to claim 1. See above re: claim 1.
8(a)	wherein the hinge member includes a body having a proximal end and a distal end,	<p>Irifune discloses a hinge member including a body having a proximal end and a distal end.</p>  <p style="text-align: right;">Body</p>
8(b)	a pivot element at said proximal end of said body adapted to rotatably attach the camera to the body so that the camera rotates about the first axis relative to the body,	<p>Irifune discloses a pivot element at the proximal end of the body of hinge member adapted to rotatably attach the camera to said body so that the camera rotates about the first axis (see above re first axis) relative to the body.</p>  <p style="text-align: right;">Pivot element</p>
8(c)	and a hinge element at said distal end of said body hingedly attaching	Irifune discloses a hinge element at the distal end of the body hingedly attaching the body to the support frame so that the body rotates, about the second axis, relative to the support

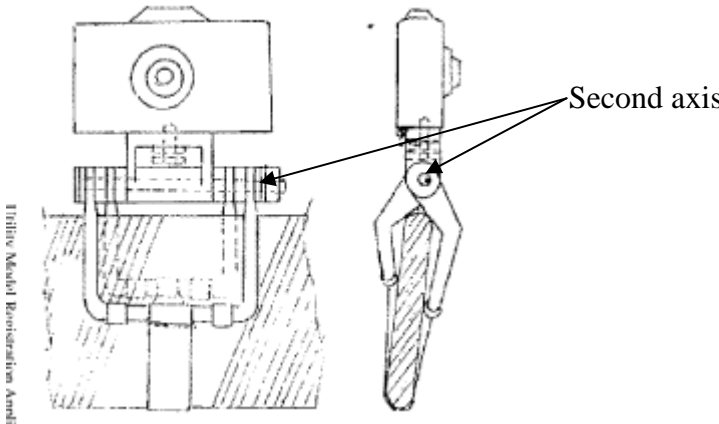
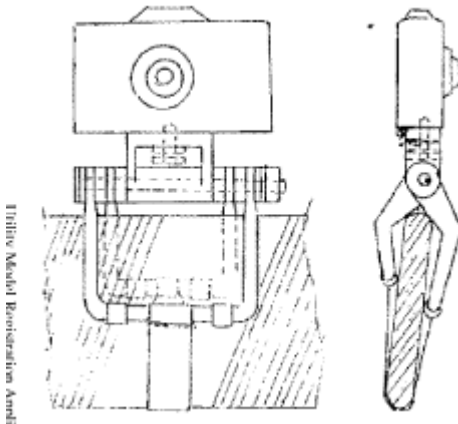
**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
	said body to the support frame so that said body rotates, about the second axis, relative to the support frame.	<p>frame.</p> 
19(p)	19. A camera clip for supporting a camera on a laptop computer, the laptop computer having a display screen which can be inclined from a generally horizontal position, an uppermost portion of the display screen defining an edge, comprising:	<p>Irifune discloses a camera clip for supporting a camera on a laptop computer having a display screen (with an uppermost portion defining an edge) that can be inclined from a generally horizontal position. <i>See</i> above at 1(p) and 1(d)</p> <p>It would have been obvious for one of ordinary skill in the art to combine Irifune with a laptop display screen in the same way as for other planar vertical surfaces as disclosed in Irifune.</p> <p>See U.S. Patent No. 5,880,783 See U.S. Design Patent No. D383,475 See U.S. Patent No. 5,808,672</p>
19(a)	a. a hinge member adapted to be rotatably attached to the camera, said camera rotating about a first axis of rotation relative to said hinge member; and	<p>Irifune discloses a hinge member adapted to be rotatably attached to the camera to allow the camera to rotate about a first axis of rotation relative to the hinge member.</p>

**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Irifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		 <p style="text-align: right;">First axis</p> <p style="transform: rotate(-90deg); position: absolute; left: 390px; top: 250px;">Irifune Model Registration Number</p>
19(b)	b. a support frame hingedly attached to said hinge member to engagingly support said hinge member on the display screen,	<p>Irifune discloses a support frame hingedly attached to the hinge member to engagingly support said hinge member on the display screen.</p>  <p style="text-align: right;">Support frame</p> <p style="transform: rotate(-90deg); position: absolute; left: 390px; top: 540px;">Irifune Model Registration Number</p>
19(c)	said hinge member rotating over a second axis of rotation relative to said support frame, the camera being maintained adjacent the edge,	<p>The hinge member rotates about a second axis of rotation relative the support frame. (See above).</p>

**Invalidity of Asserted Claims of the '343 Patent In View Of:
Japanese Unexamined Utility Model Publication H2-19997 ("Trifune")
under 35 U.S.C. 102 and/or 103**

	Claim Language	Disclosure in Prior Art
		 <p>The drawing shows a top-down view of a device with a camera lens and a side view of a handle. A label 'Second axis' with an arrow points to a pivot point on the handle. Vertical text on the left reads 'Utility Model Registration Application'.</p>
19(d)	rotation of said support frame being prevented along an axis substantially parallel to said second axis where said second axis is substantially parallel to said edge.	<p>The rotation of the support frame is prevented along an axis substantially parallel to the second axis where said second axis is substantially parallel to the edge. (See above). For example, as shown in the figures, when attached to a vertical, planar object such as a display screen, rotation is prevented along an axis parallel to the edge of the screen due to the presence of the object.</p>  <p>The drawing shows the same device as above, but now it is attached to a vertical planar object (represented by hatching). The handle is positioned against the object, demonstrating how rotation is prevented. Vertical text on the left reads 'Utility Model Registration Application'.</p>